UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CHASE WILLIAMS and WILLIAM ZHANG, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, and DAN LARIMER,

Defendants.

Case No. 1:20-cv-02809-LAK

Honorable Lewis A. Kaplan

NOTICE OF MOTION FOR LEAVE TO SUBSTITUTE PARTIES, CHANGE THE CAPTION, AND AMEND THE COMPLAINT

PLEASE TAKE NOTICE that Plaintiffs in the above-captioned action move for leave to substitute parties, change the caption, and amend the complaint. In support of this motion, Plaintiffs rely upon the accompanying memorandum of law, declaration of Jordan A. Goldstein, and any other written or oral argument as may be requested or permitted by the Court.

Dated: June 21, 2020

New York, New York

/s/ Philippe Z. Selendy

Philippe Z. Selendy Jordan A. Goldstein Joshua S. Margolin Oscar Shine SELENDY & GAY PLLC 1290 Sixth Avenue, 17th Floor New York, NY 10104 pselendy@selendygay.com jgoldstein@selendygay.com jmargolin@selendygay.com oshine@selendygay.com

Respectfully submitted,

/s/ Kyle W. Roche

Kyle W. Roche
Edward Normand
Velvel (Devin) Freedman
(pro hac pending)
Joseph M. Delich
ROCHE CYRULNIK
FREEDMAN LLP
99 Park Avenue, 19th Floor
New York, NY 10016
kyle@rcfllp.com
tnormand@rcfllp.com
vel@rcfllp.com
jdelich@rcfllp.com

Attorneys for Plaintiffs